



One Montgomery Plaza - Fourth Floor • Sikeston, MO 63801 • 573-472-9500 • (fax) 573-481-9809

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February 25, 2015

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: Special Access Data Collection, WC Docket No. 05-25, RM-10593

Telecommunications Management, LLC, FRN 0009232554

Dear Ms. Dortch,

Telecommunications Management, LLC d/b/a NewWave Communications hereby submits its essay responses suitable for public inspection, including redacted versions of its Confidential and Highly Confidential information. Versions of the essay responses containing Confidential and Highly Confidential documents have been submitted via the Federal Communications Commission's Special Access Web Portal.

Please direct any questions regarding the filing to Dave Dane, COO/CCO at (814) 244-4282 or by email at ddane@newwavecom.com.

Sincerely,

/s/ Phil Spencer

Phil Spencer
Chief Executive Officer

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Question II. A. 5: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

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Question II.A.8: Explain your business rule(s) used to determine whether to build a Connection to a particular Location. Provide underlying assumptions.

a) Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a Connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.

b) Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

c) In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you generally have experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

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Question II.A.10: Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

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Question II.A.11: Identify the five most recent Requests for Proposals (RFPs) for which you were selected as the winning bidder to provide each of the following: (a) Dedicated Services; (b) Best Efforts Business Broadband Internet Access Services; and, to the extent different from (a) or (b), (c) some other form of high-capacity data services to business customers. (The following remaining parts of this question are optional.) In addition, identify the five largest RFPs (by number of connections) for which you submitted an unsuccessful competitive bid in 2013 for each of (a) Dedicated Services; (b) Best Efforts Business Broadband Internet Access Services; and, to the extent different from (a) or (b), (c) some other form of high-capacity data services to business customers. For each RFP identified, provide a description of the RFP, the area covered, the price offered, and other competitively relevant information. Lastly, identify the business rules you rely upon to determine whether to submit a bid in response to an RFP.

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II.A.18: If you offer Dedicated Services pursuant to an agreement or Tariff that contains either a Prior Purchase-Based Commitment or a Non-Rate Benefit, then explain how, if at all, those sales are distinguishable from similarly structured ILEC sales of DS1s, DS3s, and/or PBDS

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II.A.19: Provide the business justification for the Term or Volume Commitments associated with any Tariff or agreement you offer or have in effect with a customer for the sale of Dedicated Services.

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II.D.1: Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

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II.D.2: Identify where your company's policies are recorded on the following Dedicated Service-related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

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Explanatory Attachment

The responses covered in this submission include information reported on behalf of the following entities:

Entity	Entity's FRN	Relationship
Telecommunications Management, LLC	0009232554	Parent
Avenue Broadband Communications LLC	0016918765	Subsidiary
Ultra Communications Group, LLC	0022850358	Subsidiary

The responses in Section II. A. and Section II. D. include information from Telecommunications Management, LLC, Avenue Broadband Communications LLC and Ultra Communications Group, LLC.